

Exhibit 4

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BENTHOS MASTER FUND, LTD.,

Case No. 20-CV-03384 (AJN)

Petitioner,

-v-

**RESPONDENT'S RESPONSE
TO BENTHOS MASTER FUND'S
SUBPOENA DUCES TECUM**

AARON ETRA,

Respondent.

INSTRUCTIONS

This information subpoena seeks information during the period beginning August 1, 2018 through the present, unless some other time period is specified in a particular request.

REQUESTS

1. List all bank accounts, brokerage accounts, investment accounts, checking accounts, savings accounts, and all other accounts, whether in the United States or any other country, in which You have (or had) an interest, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons, as of the date of the subpoena and since August 1, 2018.

M&T Bank ,Citibank, HSBC,Uni-credit affiliate, JP Morgan, City National Bank, TD Bank

2. As to each such account, what is the exact name on the account, the date the account was opened, the account number, the names of the signatories on the account, and the amounts presently on deposit; if closed, what was the amount on deposit when the account closed and the date it was closed? Please supply the date, name, and address of the payee or recipient of the last drawn check or wire, the amount of the last drawn check or wire, and the nature and amount of consideration received by You in exchange for the last drawn check or wire.

The accounts were in my name and I was the signatory. I believe you have sent subpoenas to most of the banks and thus have the information you need and that I do not have either because I have not kept the information and/or do not have current access to it. Please tell me which accounts you do not have any information about and I will do my best to request it and provide it.

3. Identify all credit cards in which You have (or had) an interest, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons, as of the date of the subpoena and since August 1, 2018.

HSBC- which has been cancelled, as you know (you have the information).

4. As to each such credit card, what is the exact name on the card, the date the card was opened, the credit card number, the names of the signatories on the card, and the amounts of the line of credit; if closed, what was the amount of the line of credit when the card closed

and the date it was closed? Please supply the date, name, and address of the payee or recipient of the last transaction and the amount of the last transaction.

The HSBC Card was in my name and you already have the information relevant to it.

5. Identify all assets (including real property and interests in any other entity) and any bank accounts of Investors & Developers Associates Inc. ("INDEVA"), and any other corporation or other entity controlled by You since August 1, 2018.

NONE

6. Identify any real property in which You have (or had) an interest, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons, as of the date of the subpoena and since August 1, 2018.

Identify the address and value of the real property and how much the monthly payment is, and who pays the monthly payment.

Haywood County, North Carolina, which information you have

7. Identify any leases for real property in which You have (or had) an interest, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons, as of the date of the subpoena and since August 31, 2018. Identify the address and value of the real property and how much the monthly payment is, and who pays the monthly payment.

NONE

8. Do You own any securities, including but not limited to stock or interests in publicly or privately held companies, options, derivatives, futures, debt, bonds and/or debentures? If so, please describe all such interests, including the name of the security, the amount held, the location of the security, and the values of each security.

VERIZON =10 Shares

EXXON MOBIL- 80 Shares

ENTERGY- 12 Shares

REDIFY- 100 Shares

9. Identify any safe deposit boxes or other depositories ever maintained by You, and set forth (i) the name and address of the bank or other depository, (ii) the identification number of the safe deposit box or other depository, (iii) the present contents of the safe deposit box or other depository; and (iv) any contents previously removed from the safe deposit box or other depository, the date of their removal, the recipient of the removed contents, and the reasons for the removal of the contents.

NONE

10. Identify any and all actual, proposed and/or contemplated investments by You and all direct and indirect ownership interests in any entity, and the amount of income received by You from these investments and ownership interests since August 1, 2018.

NONE

11. Identify all proposed and actual purchases by any person or entity of any asset or property owned or controlled by You, and all proposed and actual purchases by You of any asset or property owned by any person or entity.

NONE

12. Identify (i) any loans, lending commitments, advances or lines of credit ever made, extended or received by You, (ii) the names and addresses of the parties to the loans, lending commitments, advances or lines of credit, (iii) the amount of the loans, lending commitments, advances or lines of credit, (iv) all contractual terms and obligations relating thereto, and (v) any repayments of loans, lending commitments, advances or lines of credit made by or to You since August 1, 2018, the date and amount of the repayment, and the parties paying and receiving the repayment.

NONE

13. Do You have any current debts other than the one owed to Judgment Creditor? If so, as to each indebtedness, set forth (i) the amount and date of the original indebtedness, (ii) the name and address of the creditor, (iii) the basis for the indebtedness, and (iv) the amount and date of any sum repaid by You since the original indebtedness.

HSBC credit card in the amount of \$16,418.34 (YOU HAVE THE INFORMATION); DAVID HAMMER, ESQ. (LEGAL SERVICES)- \$5,250; PRYOR CASHMAN(LEGAL SERVICES)- \$12,826.40; SEAVER WANG (RENT)- \$20,000 +UTILITIES

14. Identify all persons and entities that are indebted to You, including without limitation the (i) the amount and date of the original indebtedness, (ii) the name and address of the debtor, (iii) the basis for the indebtedness, and (iv) the amount and date of any sum repaid by the debtor since the original indebtedness.

NONE

15. Identify all other proposed and actual transfers, conveyances, assignments, leases, sales or other dispositions of property, assets, cash, stock, membership interests and/or any other consideration by You to any person or entity, and from any person or entity to You, since August 1, 2018, including, but not limited to (i) the nature, date, recipient, and amount of the transfer, conveyance, assignment, lease, sale or other dispositions, and (ii) the repayment of advances and the satisfaction of judgments and any other obligations or claims of any nature.

NONE

16. Identify all monies, stock, property or other consideration paid, received, purchased, sold, transferred or exchanged by and between You and any entity owned or controlled by You (in whole or in part), and set forth (i) the nature and amount of the monies, stock, property or other consideration paid, received, purchased, sold, transferred or exchanged, (ii) the nature of the payment, receipt, purchase, sale, transfer or exchange, (iii) the date of the payment, receipt, purchase, sale, transfer or exchange, (iv) the payor and recipient of the monies, stock, property or other consideration, and (v) the consideration for the payment, receipt, purchase, sale, transfer or exchange.

Please see 8 above.

17. Identify any property or money being held in trust for You, and identify the person or entity and its address holding the property or money, and the nature and amount of property or money.

NONE

18. Identify any property or money that You have placed in trust for another person, and identify the person's address, the person's relationship to You, the nature and amount of property or money, and the date of the creation of the trust.

NONE

19. Has any execution or attachment ever been levied against Your property? If so, identify the property seized and the lawsuit.

NONE

20. Identify any motor vehicles, including but not limited to a car, SUV, motorcycle, boat, etc., in which You have (or had) an interest, whether in Your name individually, jointly, in trust, as custodian, as nominee, as a beneficiary or in conjunction with any other person or persons since August 1, 2018. Also identify the make, model, year and value of the motor vehicle and any monthly expenses, including but not limited to principal payments, insurance, gas, maintenance, etc., that You, or someone on Your behalf, pays for the motor vehicle. If someone else pays for any of these expense on Your behalf, identify the name and address of that individual.

NONE

21. Identify all cash available with a value in excess of \$1,000.

NONE

22. With respect to Your statement in an email dated August 20, 2020 that You "spent more money than I had, some \$21,000, in fighting the court battle[,]" detail all such expenses, including the bank account(s) from which any such payments were made, the recipients of such payments, and the dates of those payments.

LEGAL SERVICES OF DAVID HAMMER, ESQ. AND PRYOR CASHMAN- -
FROM VARIOUS OF ABOVE-REFERRED ACCOUNTS THEN HAVING FUNDS

23. Identify Your current residence, and any other place at which You have resided since August 1, 2018.

240 E.47th Street, Apt. 12A, New York, NY 10017

24. Detail all amounts spent in connection with Your maintenance of an office space at 445 Park Avenue, 9th Floor, since August 1, 2018, including the bank account from which any such amounts were drawn.

The rental is \$300/month and has been paid from which account had any funds at the time.

25. Are You employed? If so, identify the name of Your employer and the title of Your position.

Self-employed

26. If You are unemployed, identify how You currently pay Your living expenses, and how You have paid Your living expenses since August 1, 2018.

N/A

27. Identify Your monthly living expenses since August 1, 2018, including but not limited to rents, a mortgage, food costs, bills and invoices of any kind, utilities, transportation expenses, insurances, memberships and/or subscriptions, entertainment, etc., and set forth (i) the reason for the expense, (ii) the amount of the expense, (iii) whether You, or someone on Your behalf pays for the expense, and (iv) the bank account or credit used to pay for the expense. If someone else pays for the expense on Your behalf, identify the name and address of that individual.

RENT-\$4,100 (including utilities & repairs & payments to staff);GROCERIES- \$750; HEALTHCARE- \$100; INSURANCE-\$300; CREDIT CARD- \$700

28. Identify any monthly living expenses that You pay, or have paid, for someone other than Yourself since August 1, 2018, including but not limited to rents, a mortgage, food costs, bills and invoices of any kind, utilities, transportation expenses, insurances, memberships and/or subscriptions, entertainment, etc., and set forth (i) the reason for the expense, (ii) the amount of the expense, (iii) the bank account or credit used to pay for the expense, and (iv) how long You have been paying for the expense.

NONE

29. Are there any judgments in Your favor? If so, identify the judgments and the court, the index or case number, the parties involved and the date and amount of the outstanding judgments.

NONE

30. Are there any judgments against You besides the one entered in this action? If so, identify the judgments and the court, the index or case number, the parties involved and the date and amount of the outstanding judgments.

NONE

31. Identify all lawsuits ever filed against You, including the court, the index or case number, and the parties involved.

None, other than this case and related matter

32. Are You a party to any action now pending in any court or arbitration tribunal not involving the Judgment Creditor? If so, identify the action or arbitration.

No

33. Identify any proposed or actual settlement of any lawsuit or arbitration involving You, the parties to the settlement and the terms thereof.

None other than present case

34. Set forth the names and addresses of any person with personal knowledge or

information concerning the nature, extent and location of any assets owned or controlled by You.

Self

35. Set forth the names and addresses of any immediate family members, including any spouse, siblings, adult children or adult grandchildren.

I live alone and am responsible for my own expenses.

36. Set forth the names and addresses of all of the individuals who assisted or participated in providing information for, or formulating responses to, this Information Subpoena.

NONE

DATED: Response to Subpoena of August 27,2020

_____/s/ Aaron Etra_____
Aaron Etra, respondent